

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
THOMAS A. MCKAY  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

tkasulis@maglaw.com  
(212) 880-9555

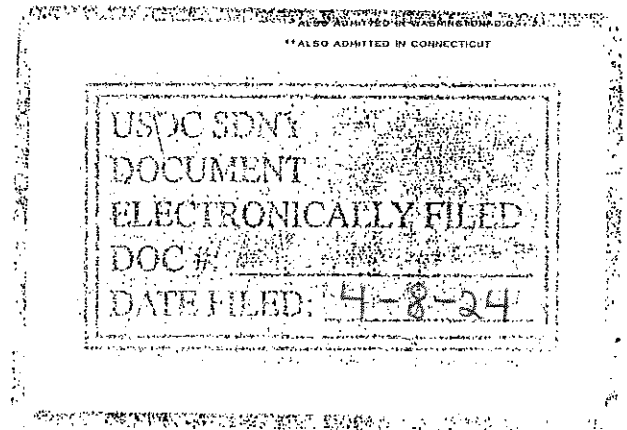
SENIOR COUNSEL  
PAUL R. GRAND  
COUNSEL  
JASMINE JUTEAU

ROBERT G. MORVILLO  
1936-2011  
MICHAEL C. SILBERBERG  
1940-2002  
JOHN J. TIGUE, JR.  
1939-2009

April 5, 2024

**By ECF**

Hon. Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312



Re: *United States v. Cyron Lee*, 23 Cr. 591 (LAK)

Dear Judge Kaplan:

We write on behalf of defendant Cyron Lee to respectfully request that the Court order the Metropolitan Detention Center ("MDC") to allow Mr. Lee out of his cell for up to four hours a day to review discovery in his case. The government has no objection to this request.

Mr. Lee has been incarcerated at the MDC since October 31, 2023, and the government made its first discovery production to counsel on December 21, 2023. While the government provided hard drives with the discovery to the MDC's law library shortly thereafter, Mr. Lee has been unable to meaningfully access those materials because of near constant lockdowns at the jail.

At our request, the government has now facilitated the transfer of the electronic law library materials to Mr. Lee's cell. However, we understand from our client that he is still unable to review discovery – other than with counsel – because of the ongoing lockdowns. On the rare occasions where he has been permitted to leave his cell, he has had to contend with more than a hundred inmates vying for the use of a single unit computer.

Mr. Lee is scheduled to go to trial on May 7, 2024 and needs to be able to review the available discovery to ensure his right to a fair trial. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Telemachus Kasulis  
Telemachus Kasulis

SO ORDERED

LEWIS A. KAPLAN, USDJ